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NEXTDOOR.COM, INC. and Counterdefendant
8 PRAKASH JANAKIRAMAN

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12
13 NEXTDOOR.COM, INC., a Delaware
14 corporation,

15 Plaintiff,

16 v.

17 RAJ ABHYANKER, an individual,

18 Defendant.

19 RAJ ABHYANKER, an individual,

20 Counterclaimant,

21 v.

22 NEXTDOOR.COM, INC., a Delaware
23 corporation; PRAKASH JANAKIRAMAN, an
24 individual; BENCHMARK CAPITAL
25 PARTNERS, L.P., a Delaware limited
26 partnership; BENCHMARK CAPITAL
27 MANAGEMENT CO. LLC, a Delaware limited
liability company; SANDEEP SOOD, an
individual; MONSOON ENTERPRISES, INC., a
California corporation, and DOES 1-50,
inclusive,

Counterdefendants.

Case No.: 3:12-cv-05667-EMC

**DECLARATION OF SANDEEP SOOD
IN SUPPORT OF NEXTDOOR.COM,
INC. AND PRAKASH
JANAKIRAMAN'S OPPOSITION TO
ABHYANKER'S MOTION TO
DISQUALIFY PLAINTIFF'S COUNSEL**

Date: June 6, 2013

Time: 1:30 p.m.

Judge: Honorable Edward M. Chen

1 I, Sandeep Sood, declare as follows:

2 1. I am the President of Monsoon Enterprises, Inc., which along with me, has been
3 named as a Counterdefendant in the above-captioned litigation.

4 2. I have reviewed Defendant and Counterclaimant Raj Abhyanker's Motion to
5 Disqualify Plaintiff's Counsel (the "Motion"), together with the supporting papers including Mr.
6 Abhyanker's declaration and exhibits (as amended) [Dkt. 73] (the "Abhyanker Declaration").

7 3. The Abhyanker Declaration contains a number of statements, that I know, based
8 on my own personal knowledge, to be false. These include at least the following:

9 4. The first false statement by Mr. Abhyanker is that I "admitted to filling out a
10 survey for the Plaintiff and providing information related to the LegalForce trade secrets to a co-
11 founder of the Plaintiff's company Nextdoor.com, Inc. (Exhibit A)." *See* Abhyanker Decl. ¶ 5.
12 While I did fill out a survey for Nextdoor.com, and told Mr. Abhyanker that I had done so, his
13 statement that I admitted I disclosed information related to the purported "LegalForce trade
14 secrets" is false. I do not even know what the alleged LegalForce trade secrets are, much less
15 "admit" that I had disclosed them to anyone. Further, the document attached as Exhibit A to the
16 Abhyanker Declaration does not contain the purported "admission" Mr. Abhyanker claims that it
17 does; my email to him merely states that I recalled filling out a survey.

18 5. The second and third false statements by Mr. Abhyanker are that I "personally
19 worked with Fenwick attorneys, in the firm's offices, to prepare [] agreements" for his company,
20 Legalforce, Inc., and "worked with Fenwick to negotiate and execute the non-disclosure and
21 confidentiality provisions related to the investment agreements which Fenwick negotiated ..." *See*
22 Abhyanker Decl. ¶ 9. Both statements are false. I never worked with any attorneys from
23 Fenwick in connection with any of the work that I did for Mr. Abhyanker's company, had no role
24 in the drafting of his or his company's corporate documents, and have never even been to
25 Fenwick's offices.

26 6. Finally, I am informed that Mr. Abhyanker has claimed that I consented to the
27 recording of a telephone conversation I had with him in or about December 2012. Although the
28 January 10, 2013 letter to Fenwick in which Mr. Abhyanker made this claim is absent from his

1 Motion, I have reviewed Fenwick's response thereto (which is attached as Exhibit F to the
2 Motion), which references the purportedly consented-to recording. While I do not know whether
3 Mr. Abhyanker actually recorded our conversation (I have never been provided with a copy of the
4 alleged recording), I did not even know that the recording was made. To the best of my
5 recollection, I did not consent to it, nor did Mr. Abhyanker even ask me to.

6 I declare under penalty of perjury under the laws of the United States that the foregoing is
7 true and correct and that this declaration was executed on May 9, 2013, in Oakland, California.

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Sandeep Sood
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